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ILLINOIS COMMERCE COMMISSION

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Interstate Power Company
And
South Beloit Water, Gas
and Electric Company

Joint Petition for Approval of
Residential Delivery Services
Implementation Plan submitted
pursuant to Section 16-105 of the
Illinois Public Utilities Act.

CHIEF CLERK'S OFFICE

Docket No. 01-0528

PETITION TO INTERVENE

Pursuant to 83 Ill. Admin. Code § 200.200, Illinois Power Company ("IPC") hereby petitions the Illinois Commerce Commission ("Commission") to be permitted to intervene as a party in the above-captioned proceeding. In support of its Petition, IPC states:

1. This docket relates to a request by Interstate Power Company and South Beloit Water, Gas and Electric Company for the Commission to approve the Residential Delivery Services Implementation Plan submitted pursuant to Section 16-105 of the Illinois Public Utilities Act.

2. IPC is a combination gas and electric utility regulated by the Commission that, on June 1, 2001, also filed tariffs to implement residential delivery services and to otherwise revise its delivery services tariffs.

3. IPC may be affected by the decision of the Commission in this docket. Therefore, IPC wishes to participate in the proceeding and present its position on the issues raised by the parties.

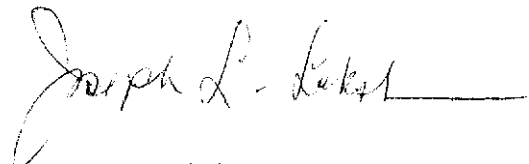
4. IPC requests that the following be added to the service list in this proceeding:

Joseph L. Lakshmanan, Esq.
Illinois Power Company
500 South 27th Street
Decatur, IL 62521-2200
(217) 362-7449
(217) 362-7458 (facsimile)

Owen E. MacBride, Esq.
Schiff Hardin & Waite
6600 Sears Tower
Chicago, IL 60606
(312) 258-5680
(312) 258-5600 (facsimile)

WHEREFORE, Illinois Power Company requests that it be permitted to intervene and to be treated as a party to this proceeding pursuant to Section 200.200 of the Commission's Rules of Practice.

Respectfully submitted,


A handwritten signature in dark ink, appearing to read "Joseph L. Lakshmanan", followed by a horizontal line.

Joseph L. Lakshmanan, Esq.
Illinois Power Company
500 South 27th Street
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Joseph_Lakshmanan@illinoispower.com

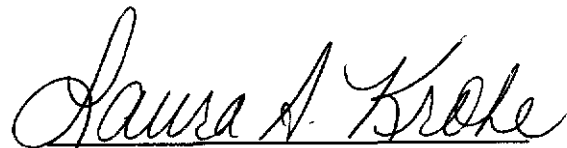
Dated: August 17, 2001

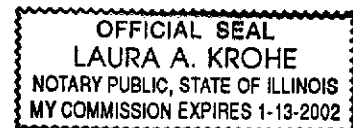
VERIFICATION

I, Joseph L. Lakshmanan, being sworn on oath, states that the foregoing Petition to Intervene is true and accurate to the best of my knowledge, information and belief.


Joseph L. Lakshmanan

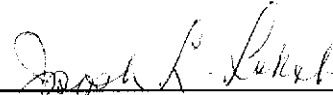
Subscribed and sworn to before me this 17th day of August, 2001.


Notary Public



CERTIFICATE OF SERVICE

I, Joseph L. Lakshmanan, certify that on the 17th day of August, 2001, I served a copy of Illinois Power Company's Petition to Intervene by first class mail, from Decatur, Illinois, postage prepaid to the individuals on the service list attached.



Joseph L. Lakshmanan, Esq.

Service List

Docket No. 01-0528

DAVID ELEY
SOUTH BELOIT WATER GAS & ELECTRIC COMPANY &
INTERSTATE POWER
12014 WAXWING CT.
ROSCOE, IL 61073

DARCY L HACKEL
REGULATORY AND RESTRUCTURING
SOUTH BELOIT WATER & GAS ELECTRIC COMPANY & INTERSTATE POWER
ALLIANT ENERGY
222 W. WASHINGTON AVE.
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KAREN M HUIZENGA
ATTORNEY
MIDAMERICAN ENERGY COMPANY
106 E. SECOND ST.
PO BOX 4350
DAVENPORT, IA 52808

ROBERT P JARED
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